

1 Law Offices of Ronald A Norman
2 5404 Whitsett Avenue, Suite 133
3 Valley Village, CA 91607
4 818-761-7181
5 Fax : 818-232-9283
6 Email: ronaldanorman@sbcglobal.net
7 Counsel for Debtor

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA-**
10 **SAN FERNANDO VALLEY DIVISION**

11 In re:

12 SHAUN MICHAEL REYNOLDS

13 Debtor

} Case No.: 1:18-bk-10147-MT

} Chapter 13

} MOTION FOR ORDER EXTENDING TIME RE
} SCHEDULES AND STATEMENTS

} *DEBTOR'S MOTION TO EXTEND TIME TO FILE CASE*
} *OPENING DOCUMENTS (with supporting declaration) [FRBP*
} *1007(c), LBR 1007-1(b)]*

} *Date filed: 01/16/2018*

} *341 meeting: 02/21/2018*

} *Confirmation hearing 03/27/2018*

} *Deadline for claims: 03/27/2018*

} *Deadline for claims (govt.): 07/16/2018*

21 _____
22 Debtor, through his counsel of record, hereby respectfully requests an order from this
23 Court extending the time by which he must file the schedules, statements, and other documents
24 required by Federal Rules of Bankruptcy Procedure Rule 1007 subdivision (b), (1), (4), (5), and
25 (6) (collectively "Schedules"), and an order extending the time by which he should file this
26 motion requesting such.
27
28

MOTION FOR ORDER EXTENDING TIME

BACKGROUND

On January 16, 2018, Debtor's petition was prepared and filed in an expedited manner to stop a pending foreclosure sale of the Debtor's substantial financial interests in certain real property.

Debtor's petition was to include all of said schedules, however, unbeknownst to the filer, said schedules were not included.

The deficiency was not discovered until the status of the case was reviewed the date of this motion.

RELIEF REQUESTED

Debtor requests an order, substantially in the form submitted herewith, extending the time within which he may file his schedules and since said schedules are now past due (for the reasons herein set forth) for an order extending the time to for him to file this motion.

JURISDICTION AND VENUE

This Court has jurisdiction to consider this motion under 28 U.S.C. §§ 157 and 1334 and venue is proper under 28 U.S.C. §§ 1408 and 1409. This is a core proceeding under 28 U.S.C. § 157(b).1

BASIS FOR RELIEF REQUESTED

The relief is appropriate under sections 105(a) and 521(a) of the Bankruptcy Code and Bankruptcy Rules 1007(b)(1) and (c).

Debtor's petition was prepared and filed in an expedited manner to stop a pending foreclosure sale of the Debtor's substantial financial interests in certain real property.

MOTION FOR ORDER EXTENDING TIME

1 Debtor's petition was to include all of said schedules, however, unbeknownst to the filer,
2 said schedules were not included, but the deficiency was not discovered until the status of the
3 case was reviewed the date of this motion.

4 Under section 521(a) of the Bankruptcy Code and Bankruptcy Rule 1007(b)(1), the
5 Debtor is required to file Schedules within 14 days of the petition date.
6

7 Local Rule 1007-1(b) provides that an extension of the time to file the Schedules and
8 Statements "shall be granted, for cause . . . upon filing of a motion by the debtor." Del. Bankr.
9 L.R. 1007-1(b).

10 Section 105(a) of the Bankruptcy Code grants the Court broad authority to "issue any
11 order . . . that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." 11 U.S.C. § 105(a).
12
13

14 WHEREFORE, the Debtor requests entry of an order granting the relief requested in its
15 entirety and any other relief as is just and proper extending the requested time. .
16

17 Debtor has not requested, or been granted any prior extension of time.

18 This motion is not made for the purposes of delay and no creditor will suffer any
19 prejudice if Debtor is granted an additional extension of time.
20

21 The Debtor submits that no other or further notice is necessary under the circumstances

22 Dated: February 4, 2018

23 /s/ Ronald A Norman

24

Ronald A Norman
25 Attorney for Debtor
26
27
28

In re:

Shaun Michael Reynolds

Main Document

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CHAPTER: 13

Debtor(s).

CASE NUMBER: 1:18-bk-10147-MT

NOTE: When using this form to indicate service of a proposed order, **DO NOT** list any person or entity in Category I. Proposed orders do not generate an NEF because only orders that have been entered are placed on a CM/ECF docket.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

5404 Whitsett Avenue, suite 133
Valley Village, CA 91607

A true and correct copy of the foregoing document described as MOTION FOR ORDER EXTENDING TIME RE SCHEDULES AND STATEMENTS will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d), and **(b)** in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") - Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On 02/04/2018 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addressed indicated below:

The case trustee and U.S. Trustee will be automatically served by the Court at their email address.

See NEF for confirmation of electronic transmission to the U.S. Trustee and any trustee in this case, and to any attorneys who receive service by NEF.

☐ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):

On 02/04/2018 I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follow. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____ I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method) by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

02/04/2018

Ronald A. Norman

Date

Type Name

/S/ Ronald A. Norman

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

In re:

Chantilly Circle Trust

Main Document

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CHAPTER: 7

Debtor(s).

CASE NUMBER: 1:11-bk-22482-AA

ADDITIONAL SERVICE INFORMATION (if needed):

Bayview Loan Servicing, LLC
4425 Ponce de Leon Boulevard, 5th Floor
Coral Gables, FL 33146

Nationstar Mortgage Seterus, Inc.
Post Office Box 619063
Dallas, TX 75261

Select Portfolio Servicing, Inc.
P.O. Box 65250
Salt Lake City, UT 84165-0250

Seterus, Inc.
PO Box 1077
Hartford, CT 06143